

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MICHAEL W. TOLOMEO and
SERAFIN CHAVEZ, individually, and as
representatives of a Class of Participants
and Beneficiaries of the RR Donnelley
Savings Plan,

Plaintiffs,

v.

R.R. DONNELLEY & SONS, INC., et al.,

Defendants.

Case No. 1:20-cv-7158

Hon. Mary M. Rowland

**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND COSTS, ADMINISTRATIVE
EXPENSES, AND A CASE CONTRIBUTION AWARD**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on May 23, 2024 at 10:00 am. in Courtroom 1225 of the Everett M. Dirksen U.S. Courthouse, 219 S. Dearborn St., Chicago, IL, 60604, of the United States District Court for the Northern District of Illinois, in Chicago, Illinois, Plaintiffs Michael W. Tolomeo and Serafin Chavez ("Plaintiffs") will and hereby do move this Court for an Order awarding: (1) attorneys' fees to Class Counsel in the amount of \$391,666 (one-third of the \$1,175,000.00 Gross Settlement Amount); (2) reimbursement of \$79,029.43 in litigation costs, and \$95,000.00 in settlement administration expenses (including \$15,000 to the independent fiduciary); and (3) a case contribution award in the amount of \$7,500 for each named Plaintiff.

This motion is made pursuant to Federal Rule of Civil Procedure 23(h) and Paragraph 7.2(a)

of the Parties' Class Action Settlement Agreement (Dkt. 96-1) and is based on the accompanying Memorandum of Law and authorities cited therein, the Declaration of Paul M Secunda, the previously filed declaration of the Class Representatives (Dkt. Nos. 97, 98), the Settlement Agreement, and all files, records, and proceedings in this matter.

Counsel for Plaintiffs has conferred with counsel for Defendants regarding this motion and have been advised that Defendants do not oppose the motion. As of the filing of this motion, there also have been no objections to the Settlement or the proposed attorney fees and other expenses in that Notice.

Dated this 18th day of April, 2024

WALCHESKE & LUZI, LLC

s/ Paul M. Secunda

Paul M. Secunda

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ATTORNEYS FOR PLAINTIFFS and
SETTLEMENT CLASS

CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2023, I caused a copy of the foregoing to be electronically filed with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

s/Paul M. Secunda
Paul M. Secunda